REMARKS

This Amendment is responsive to the second Office Action dated March 9, 2001. Claims 1-20 are pending in the present application.

Information Disclosure Statement

In the second Office Action, the Examiner stated that the Information Disclosure Statement filed 6/29/99 failed "to comply with the provisions of 37 CFR 1.97, 1.98 and MPEP §609 because the references from the internet site does not have the published date."

Pursuant to 37 CFR 1.98(b), Applicants hereby submit a revised PTO-Form 1449 providing the dates of publication, and the appropriate fee.

Prior Art Rejections

In the second Office Action, the Examiner rejected claims 1, 8, 11-13 under 35 U.S.C. §103(a) as being unpatentable over Xu (U.S. Patent No. 5,848,420) ("Xu") in view of Narayen et al. (U.S. Patent No. 6,035,323) ("Narayen"). Claims 2-5, 9-10, 14-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Xu and Narayen, as applied to claim 1, and further in view of Cohen et al. (U.S. Patent No. 5,805,829). The Examiner rejected claims 6-7 and 19-20 under 35 U.S.C. §103(a) as being unpatentable over Xu and Narayen, as applied to claim 5, and further in view of Wang et al. (U.S. Patent No. 6,058,428). In rejecting independent claim 1, the Examiner stated:

> Regarding independent claim 1, Xu discloses:
>
> Connection between the digital camera and the computer (figure 1; col 3, lines 55-67 to col 4, lines 1-3; col 4 lines 30-45)
> Mounting the image capture device as a disk on the host computer (abstact; col 2, lines 15-35)

Xu does not disclose generating the image files stored in the digital camera into HTML format and opening those files in the computer system without loading any camera-specific software.

Narayen discloses:

generating an Internet page description file in the image capture device that references the images stored therein (figure 1, steps 10, 12; figure 5, steps 225, 229)

opening the Internet page description file in a web browser on the host computer, wherein the images stored in the image capture device are displayed on the host computer through the web browser without the need for loading camera-specific communication software onto the host computer (figure 4, col 7, lines 14-48)

establishing communication between the image capture device and the host computer (col 5, lines 50-67; col 6, lines 28-45)

The Examiner also stated that "[c]laims 8, 13 are for the system and the computer-readable medium of the method claim 1, and therefore are rejected under the same rationale."

Applicants respectfully traverse the Examiner's rejection. The present invention provides a method and system for viewing images from a digital camera on a personal computer ("PC") without having to first load any type of communication software onto the PC. This is accomplished by automatically generating in the camera an Internet description file, such as an HTML file, that references the images stored in the camera, and then by connecting the digital camera to the PC as a mass storage device. That way, the Internet description file is easily accessible by the computer's web browser, whereby the user may view the camera images through the PC's web browser. Accordingly, the present invention eliminates the requirement that the camera user load any type of communication software onto the host before being able to view the camera images.

Independent claim 1 recites:

1 A method for viewing images from an image capture device on a host computer, comprising steps of:
a) establishing communication between the image capture device and the host

computer;
b) automatically generating an Internet page description file in the image capture device that references the images stored therein;
c) mounting the image capture device as a disk on the host computer; and
d) opening the Internet page description file in a web browser on the host computer, wherein the images stored in the image capture device are displayed on the host computer through the web browser without the need for loading camera-specific communication software onto the host computer.

Independent claim 8 is a system claim of similar scope to claim 1. Claim 13, recites:

> 13. A computer-readable medium containing program instructions for viewing images from a digital camera on a host computer, the program instructions for:
> a) automatically generating an HTML file that references the images stored in the digital camera;
> b) establishing a Universal Serial Bus (USB) connection between the digital camera and the host computer; and
> c) identifying the digital camera to the host computer as a mass storage device class whereby the digital camera appears to the host computer as a disk, thereby allowing a user to open the HTML file in a web browser on the host computer, wherein the images stored in the digital camera are displayed on the host computer through the web browser without the need for loading camera-specific communication software onto the host computer.

Applicant respectfully submits that Xu in view of Narayen fails to teach or suggest the present invention as recited in claims 1, 8 and 13. First, Xu discloses a digital camera coupled to a personal computer. A software program that is loaded onto the host computer and "permanently stored in [the computer's] memory 92" permits the computer to make the memory in the digital camera appear as a disk to the operating system of the computer. (Abstract; col. 4, lines 4-10). Without the software program, Xu would not be able to mount the digital camera as a disk onto the computer.

Narayen is directed to the distribution of a collection of digital media, such as images from a digital camera, over a network, such as the Internet. In Narayen, digital images are downloaded from the digital camera into "a digital processing system, such as a computer system." (Col. 6, lines 31-34). Once the images are stored in the computer system, the user

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creates an album comprised of "album format data." Such data includes a page layout and style of the images chosen from the downloaded images. (Col. 8, lines 10-20). The album format data and the images are then transmitted to a server computer system, where the data is stored and the images are converted into a web-viewable format. (Col. 8, lines 21-42). When a request to view the album is received by the server, the server "generates an appropriate page of an album in HTML format and sends the page to the web browser which requested a viewing of the album." (Col. 8, lines 45-58).

Xu combined with Narayen teaches a digital camera coupled to a personal computer, which is further coupled to a server. The software program of Xu is loaded onto and permanently stored in the personal computer of Narayen, which allows the digital camera to appear as a disk to the personal computer. The images stored in the digital camera are transmitted via a serial communication port to the personal computer, and the user creates an album comprised of album format data referencing the images. The album format data and images are transmitted to the server, where when requested, an HTML page referencing the images is created according to the layout and style identified by the album format data. The HTML page is viewable by the requester via a web browser.

Neither Xu nor Narayen, singularly or in combination, teach or suggest "mounting the image capture device as a disk on the host computer . . . without the need for loading . . . communication software onto the host computer," as recited in claims 1, 8 and 13. In the present invention, the digital camera identifies itself as a mass storage device class to the host computer's operating system through communication software *in the digital camera*. (Specification, page 10, lines 7-10. In response, the host computer's operating system executes existing protocols to load the appropriate drivers to mount the digital camera as a disk volume. (Id., lines 10-13). Thus, because the present invention takes advantage of the *existing* functionality of the host

computer's operating system, there is no need to load any type of communication software onto the host computer in order to mount the camera as a disk.

In the Office Action, the Examiner states that Narayen does not disclose mounting the image capture device as a disk on the host computer without loading camera-specific communication software. The Examiner, however, contends that Xu does disclose such a feature. Applicants respectfully disagree. In Xu,

> the software program of the [Xu] . . . is permanently stored in [the computer's] memory and is loaded when the computer is booting by the operating system into RAM. The software program of the present invention is programmed as a disk device driver to the operating system; such device drivers provide controls to disk devices.

(Col. 4, lines 4-10). Thus, Xu requires that its communication software be loaded into the host computer. Without the software program, Xu's computer does not have the ability to communicate with the digital camera as a disk. Accordingly, Xu cannot teach or suggest "mounting the image capture device as a disk on the host computer . . . without the need for loading . . . communication software onto the host computer," as recited in claims 1, 8 and 13.

Furthermore, Xu in view of Narayen also fails to teach or suggest automatically generating "*in the image capture device*" an Internet page description file or HTML file that references the images stored in the image capture device or digital camera, as recited in claims 1, 8 and 13. As the Examiner has correctly noted, "Xu does not disclose generating the image files stored in the digital camera into HTML format." The Examiner, however, argues that Narayen discloses this feature in Figure 5 and the accompanying text at column 7, lines 38-48 and column 8, lines 7-21.

Figure 5 is an overview of the process taught in Narayen. Step 225 states, "acquire images and build ("author") an album . . . that can be converted into internet-viewable format

(e.g., HTML format)." Column 8, lines 11-14 state the images are "acquired *from* a digital camera, or a scanner, or from a file storage device such as a CD ROM or hard disk." Clearly, if images are acquired *from* a digital camera, they are downloaded onto the personal computer. Step 227 states, "publish software *transmits* the album format data and signature (or images) *to a server computer system*." As is shown in Figure 2, the server computer system 111 is a computer system separate and apart from the personal computer system 121, 125, 135, 137 to which the digital camera is coupled. Step 229 states, "server computer system saves album format data and images in a database (images are converted into web viewable format)." At Step 233, the "server computer system generates an appropriate page of an album in HTML format and sends the page to the web browser which requested the album." Thus, the "server computer system" generates the Internet viewable file.

While Narayen teaches generating web viewable pages referencing images from the digital camera, Narayen does not teach or suggest generating such web viewable pages automatically "in the image capture device" or "in the digital camera." Narayen clearly discloses that, while the album format data "is convertible into an Internet viewable format such as the HTML format" (col. 8, lines 20-21), it is "[t]he server computer system in step 233 [that] generates an appropriate page of an album in HTML format and sends the page to the web browser which requested a viewing of the album." Col. 8, lines 55-58. Narayen's "digital acquisition device (e.g., a digital camera)" plays no role in generating an Internet viewable file other than providing the digital images.

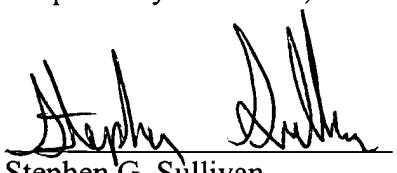
Accordingly, Applicant respectfully submits that nothing in Figure 5 or the cited portions of Narayen teach or suggest automatically generating "*in the image capture device*" or "in the digital camera" an Internet viewable file, such as an HTML file, as recited in claims 1, 8 and 13. Claims 1, 8 and 13 are therefore, allowable over Xu and Narayen.

For the reasons discussed above, Applicants respectfully submit that claims 1, 8 and 13 are allowable over Xu and Narayen. Claims 2-7, 9-12, and 14-20 depend on independent claims 1, 8, and 13 respectively. Accordingly, the arguments above apply with equal force to the dependent claims. Applicant respectfully submits, therefore, that claims 2-7, 9-12, and 14-20 are allowable over the cited references.

In view of the foregoing, it is submitted that the claims in the application are patentable over the cited reference and are in condition for allowance. Reconsideration of the rejections and objections is requested.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,



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MARKED VERSION TO SHOW CHANGES MADE

IN THE SPECIFICATION

Page 1, paragraph 1.

This application is a Continuation-In-Part of ~~co-pending~~ U.S. Patent ~~Application Serial~~ No. ~~09/059,611~~ 6,223,190, entitled "A Method And System For Producing An Internet Page Description File On A Digital Imaging Device," filed on April 13, 1998.